

**APPENDIX C**  
**INSPECTION PLAN**

## TABLE OF CONTENTS

LIST OF FIGURES .....	ii
LIST OF ABBREVIATIONS/ACRONYMS .....	iii
INSPECTION PLAN.....	C-1
C.1 GENERAL INSPECTION SCHEDULES AND REQUIREMENTS .....	C-1
C.1.1 Inspection Records .....	C-2
C.1.2 Inspection Frequency .....	C-3
C.1.3 Actions Resulting From Inspections .....	C-3
C.2 INSPECTION SCHEDULE AND REQUIREMENTS FOR CONTAINER STORAGE UNITS .....	C-4
C.2.1 On Day(s) of Waste Handling .....	C-4
C.2.2 Weekly .....	C-4
C.3 INSPECTION SCHEDULE AND REQUIREMENTS FOR TANK SYSTEMS .....	C-5
C.3.1 Daily (During Operation) .....	C-5
C.3.2 Weekly .....	C-5
C.3.3 Annually .....	C-6
C.4 INSPECTION SCHEDULE AND REQUIREMENTS FOR OPEN BURNING/OPEN DETONATION UNITS .....	C-7
C.4.1 On Day of Treatment.....	C-7
C.4.2 Weekly .....	C-7
C.5 INSPECTION SCHEDULE AND REQUIREMENTS FOR CEMENTATION UNITS .....	C-7
C.5.1 Daily (During Operation) .....	C-8
C.5.2 Weekly .....	C-8
C.6 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART AA REQUIREMENTS .....	C-9
C.7 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART BB REQUIREMENTS .....	C-9
C.8 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART CC REQUIREMENTS .....	C-9
C.9 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART DD REQUIREMENTS .....	C-9

## LIST OF FIGURES

<u>FIGURE NO.</u>	<u>TITLE</u>
C-1	Hazardous and Mixed Waste Facility Inspection Record Form

## LIST OF ABBREVIATIONS/ACRONYMS

20.4.1 NMAC	New Mexico Administrative Code, Title 20, Chapter 4, Part 1
AR	Action Required
CSU	container storage unit
IRF	Inspection Record Form
LANL	Los Alamos National Laboratory
NA	Not Applicable
TA	technical area

## **APPENDIX C**

### **INSPECTION PLAN**

In accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20.4.1 NMAC) § 264.15, revised June 14, 2000 [6-14-00], this appendix presents inspection requirements applicable to all currently existing hazardous or mixed waste management units at Los Alamos National Laboratory (LANL) that are included in technical area (TA)-specific permit applications, permit modification requests, or permit renewal applications. Pursuant to 20.4.1 NMAC § 264.15(a) [6-14-00], inspection schedules for the units have been developed to identify equipment malfunctions and deterioration, operator errors, and discharges that might cause or lead to a release of hazardous or mixed waste and pose a threat to human health and the environment. As specified in 20.4.1 NMAC § 270.14(b)(5) [6-14-00], this inspection plan, which presents general inspection schedules, is being submitted with this permit renewal application. Inspections will be conducted often enough to identify problems in time to correct them before they harm human health or the environment. Inspection schedules or methods may differ at certain waste management units based upon worker safety issues or the nature of the safety and emergency equipment. In these cases, the specific inspection schedules or methods are or will be included in Attachment C of TA-specific permit applications, permit modification requests, or permit renewal applications.

#### **C.1 GENERAL INSPECTION SCHEDULES AND REQUIREMENTS [20.4.1 NMAC § 270.14(b)(5) and 20.4.1 NMAC § 264.15(b) and (c)]**

In accordance with the requirements of 20.4.1 NMAC § 270.14(b)(5), and 20.4.1 NMAC § 264.15(b)(1) [6-14-00], a written inspection schedule has been developed at LANL. This schedule will be followed for the inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, and responding to environmental or human health hazards. Inspections may be conducted at any time during the applicable day or week, as specified in the inspection schedule. A copy of this inspection plan, which includes inspection schedules, will be maintained by LANL's Solid Waste Regulatory Compliance Group and by the site operator (i.e., the division or operating group that is responsible for or manages the unit), as required in 20.4.1 NMAC § 264.15(b)(2) [6-14-00].

Inspection schedules outlining the items to be addressed on LANL's Hazardous and Mixed Waste Facility Inspection Record Form (IRF) and inspection frequencies for the unit types addressed in TA-specific permit applications, permit modification requests, or permit renewal applications are

provided in Sections C.2 through C.9. The IRF and instructions for its completion are provided for informational purposes only as Figure C-1 of this appendix; the form may be supplemented, changed, or otherwise replaced with an equivalent form. Pursuant to 20.4.1 NMAC § 264.15(b)(3) [6-14-00], the IRF lists the types of problems to be looked for during an inspection. The activities discussed below are addressed according to the specified regulatory requirements as well as to existing LANL inspection requirements for hazardous and mixed waste management units.

#### C.1.1 Inspection Records [20.4.1 NMAC § 264.15(d)]

Inspection training is provided through LANL's Performance Surety Division's ES&H Training Group. The division or operating group is responsible for ensuring that training is repeated, as necessary. After training, personnel assigned from the division or operating group that is responsible for or manages the unit will conduct inspections and record the information on IRFs or equivalent forms. The division or operating group responsible for or managing the unit will retain the inspection records for a minimum of three years from the date of inspection. During that timeframe, the inspection records will be available for review in the event that the New Mexico Environment Department or the U.S. Environmental Protection Agency inspects the facility for compliance with inspection requirements.

If necessary, LANL may modify the IRF or develop a form equivalent to it. Because the IRF is a comprehensive form, not all sections of the form apply to all units. The IRF encompasses 20.4.1 NMAC, Subpart V, Part 264 [6-14-00], requirements for permitted hazardous and mixed waste management units, and additional requirements directed by LANL policy. Instructions included with the IRF provide specific guidance for each inspection item listed.

The IRF or equivalent form will be completed according to the daily and/or weekly schedules provided in Sections C.2 through C.9. Inspections will be conducted and recorded in Parts I and II of the IRF for each working day or week that waste is opened, moved, received, stored, treated, or removed, as appropriate. Other records, such as a memo to file, may be used to document a condition of "No Use" at a unit.

For every item requiring inspection, a response indicating the condition of each item must be entered in the column under the appropriate day of the week. Responses may include "OK," "NA" (Not Applicable), or "AR" (Action Required). If the response is AR, the action required must be noted in Part II of the IRF. If more than one AR is listed, ARs should be numbered. All ARs must

be identified and noted, even if corrected immediately by the inspector. If inspection results indicate that corrective measures are warranted, any and all actions taken (along with time, date, and other pertinent information) will be recorded in Part II of the IRF and the AR noted on all subsequent IRFs until corrective measures are completed. Only after corrective measures have been completed and recorded on an IRF can an OK be entered in the "Condition" column on the IRF.

#### C.1.2 Inspection Frequency [20.4.1 NMAC § 264.15(b)(4)]

Inspection frequencies relevant to the unit types at LANL are presented in Sections C.2 through C.9 of this appendix and/or in Attachment C of TA-specific permit applications, permit modification requests, or permit renewal applications. Inspection frequencies may be increased at LANL's discretion when it determines that increased frequency may further assist in the detection or prevention of environmental hazards.

#### C.1.3 Actions Resulting From Inspections [20.4.1 NMAC § 264.15(c)]

If any defects, deterioration, operator errors, discharges, or potential hazards are discovered during an inspection, appropriate corrective measures (e.g., transfer of waste from a defective container to an appropriate container in good condition, repair or replacement of nonfunctioning equipment and/or systems, or removal of any accumulated liquids) will be completed on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Any action taken in response to an inspection will be noted on the IRF or IRF documentation.

If a hazardous condition is imminent or has already occurred, an assessment of the condition will be made immediately, followed by appropriate remedial action. The condition will be assessed by the division or operating group that is responsible for or manages the unit. If this assessment indicates that human health or the environment may be adversely affected, the contingency plan (Appendix E of this document) may be implemented. The contingency plan discusses the appropriate responses to emergency situations. Evacuation determinations will be made as outlined in Table E-4 of the contingency plan. In the event the contingency plan is implemented, any sampling, decontamination, and verification will be conducted as specified in that plan. If the condition is such that the contingency plan is not implemented, remedial action will be defined and documented by the division or operating group that is responsible for or manages the unit.

## C.2 INSPECTION SCHEDULE AND REQUIREMENTS FOR CONTAINER STORAGE UNITS

[20.4.1 NMAC §§ 264.15(b) and 264.174]

Container storage units (CSU) are inspected according to the schedule provided below and/or in TA-specific permit applications, permit modification requests, or permit renewal applications. Inspection frequencies are adequate based on the deterioration rates of equipment/systems and the probability of harm to human health or the environment if failure of the equipment/systems occurs, or any operator error goes undetected between inspections.

### C.2.1 On Day(s) of Waste Handling

Inspections will be conducted every day of or the day after waste handling, with special attention placed on areas subject to spills, such as loading and unloading areas. Waste handling includes when waste is received at, moved or opened within, treated at, or removed from a CSU. For inspections of CSUs, the following items will be addressed, as appropriate:

- General information (Items 1-6)
- Secondary containment structures
- Run on/off control
- Covers/lids of containers
- Labels
- Accumulation start date
- Compatibility
- Structural integrity of containers
- (Un)loading area
- Presence and condition of shaft cover

### C.2.2 Weekly

Weekly inspections of CSUs will be conducted every week that waste remains in storage. These weekly inspections will address the following items, as appropriate:

- General information (Items 1-6)
- Communications equipment
- Warning signs
- Security
- Work surfaces/floors
- Spill/fire equipment
- Eyewashes/safety showers
- Wind sock
- Secondary containment structures
- Run on/off control
- Covers/lids of containers

- Labels
- Accumulation start date
- Compatibility
- Structural integrity of containers
- (Un)loading area
- Aisle space/stacking
- Pallets/raised containers
- Presence and condition of shaft cover

C.3 INSPECTION SCHEDULE AND REQUIREMENTS FOR TANK SYSTEMS [20.4.1 NMAC §§ 264.15(b), 264.193(i), and 264.195]

Resource Conservation and Recovery Act-regulated tank systems are inspected according to the schedule provided below and/or in TA-specific permit applications, permit modification requests, or permit renewal applications. The inspection frequency is adequate based on the deterioration rate of equipment/systems and the probability of adverse impact to human health or the environment if failure of the equipment/systems or any operator error goes undetected between inspections.

C.3.1 Daily (During Operation)

Tank systems (including ancillary equipment) will be inspected at least once each operating day. An operating day includes when waste is added to or emptied from a tank, or when tank treatment is conducted. Tank systems will be inspected for the items listed below, as appropriate:

- General information (Items 1-6)
- Secondary containment structures
- Labels
- Structural integrity of tanks and ancillary equipment
- (Un)loading areas
- Aboveground portions of tank systems to detect corrosion or releases of waste and to detect any possible malfunctions to overflow/spill control equipment, tank monitoring and leak detection systems, and data from these systems
- Proper operating condition of treatment tank (if applicable)

C.3.2 Weekly

Weekly inspection requirements for tank systems include the following items, as appropriate:

- General information (Items 1-6)
- Communications equipment
- Warning signs
- Security
- Work surfaces/floors
- Spill/fire equipment
- Eyewashes/safety showers
- Wind sock, if applicable
- Secondary containment structures
- Run on/off controls, if applicable
- Labels
- Accumulation start date, if appropriate
- Structural integrity of tanks and ancillary equipment
- (Un)loading areas
- Aboveground portions of tank systems to detect corrosion or releases of waste, overfill/spill control equipment, tank monitoring and leak detection systems, and data from these systems
- Proper operating condition of treatment tank (if applicable)

### C.3.3 Annually

In accordance with 20.4.1 NMAC § 264.193(i) [6-14-00], an annual assessment of the overall condition of a tank system that does not have secondary containment will be performed by an independent, qualified registered professional engineer. The assessment procedure must be adequate to detect obvious cracks, leaks, and corrosion or erosion that may lead to cracks and leaks. Stored waste must be removed from the tank, if necessary, to allow the condition of all internal tank surfaces to be assessed. The frequency of these assessments must be based on the material of construction of the tank and its ancillary equipment, the age of the system, the type of corrosion or erosion protection used, the rate of corrosion or erosion observed during the previous inspection, and the characteristics of the waste being stored or treated.

#### C.4 INSPECTION SCHEDULE AND REQUIREMENTS FOR OPEN BURNING/OPEN DETONATION UNITS [20.4.1 NMAC §§ 264.15(b) and 264.602]

Open burning/open detonation units are inspected according to the schedule provided below. Inspection frequencies are adequate based on the deterioration rates of equipment/systems and the probability of harm to human health or the environment if failure of the equipment/systems occurs, or any operator error goes undetected between inspections.

##### C.4.1 On Day of Treatment

Inspections will be conducted every day of operation (i.e., every day that open burning/open detonation occurs). For inspections conducted on the day of treatment at open burning/open detonation units, the following items will be addressed, as appropriate:

- General information (Items 1-6)
- Secondary containment structures (if applicable)
- Detonation pad run on/off control (if applicable)
- (Un)loading area

##### C.4.2 Weekly

Weekly inspections of open burning/open detonation units will be conducted if no treatment will occur during that week or when waste is present on the treatment unit and awaiting treatment.

Weekly inspections will address the following items, as appropriate:

- General information (Items 1-6)
- Communications equipment
- Warning signs
- Security
- Work surfaces
- Spill/fire equipment
- Eyewashes/safety showers
- Wind sock (if applicable)
- Secondary containment structures (if applicable)
- Detonation pad run on/off control (if applicable)
- Open burning units covered when not in use
- (Un)loading area

#### C.5 INSPECTION SCHEDULE AND REQUIREMENTS FOR CEMENTATION UNITS [20.4.1 NMAC §§ 264.15(b) and 264.602]

Cementation units will be inspected according to the schedule provided below and/or in TA-specific permit applications, permit modification requests, or permit renewal applications. The inspection frequency is adequate based on the deterioration rate of equipment/systems and the probability of harm to human health or the environment if failure of the equipment/systems or any operator error goes undetected between inspections.

#### C.5.1 Daily (During Operation)

Cementation units for treatment by solidification will be inspected each operating day (i.e., when waste is treated in the unit). For the daily inspection of the cementation unit, the following items will be addressed, as appropriate.

- General information (Items 1-6)
- Warning signs
- Work surfaces/floors
- Secondary containment structures
- Covers/lids of containers
- Labels
- (Un)loading area
- Structural integrity of cementation unit

#### C.5.2 Weekly

Weekly inspections of cementation units will be conducted if no treatment will occur during that week. Weekly inspections will address the following items, as appropriate:

- General information (Items 1-6)
- Communications equipment
- Warning signs
- Security
- Work surfaces/floors
- Spill/fire equipment
- Eyewashes/safety showers
- Secondary containment structures
- Covers/lids of containers
- Labels
- (Un)loading area
- Structural integrity of cementation unit

C.6 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART AA REQUIREMENTS [20.4.1 NMAC, Subpart V, Part 264, Subpart AA]

Inspection and monitoring requirements for units subject to 20.4.1 NMAC, Subpart V, Part 264, Subpart AA [6-14-00], are addressed, if applicable, in Attachment C of TA-specific permit applications, permit modification requests, or permit renewal applications.

C.7 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART BB REQUIREMENTS [20.4.1 NMAC, Subpart V, Part 264, Subpart BB]

Inspection and monitoring requirements for units subject to 20.4.1 NMAC, Subpart V, Part 264, Subpart BB [6-14-00], are addressed, if applicable, in Attachment C of TA-specific permit applications, permit modification requests, or permit renewal applications.

C.8 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART CC REQUIREMENTS [20.4.1 NMAC, Subpart V, Part 264, Subpart CC]

Inspection and monitoring requirements for units subject to 20.4.1 NMAC, Subpart V, Part 264, Subpart CC [6-14-00], are addressed, if applicable, in Attachment C of TA-specific permit applications, permit modification requests, or permit renewal applications.

C.9 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART DD REQUIREMENTS [20.4.1 NMAC, Subpart V, Part 264, Subpart DD]

Inspection and monitoring requirements for units subject to 20.4.1 NMAC, Subpart V, Part 264, Subpart DD [6-14-00], are addressed, if applicable, in Attachment C of TA-specific permit applications, permit modification requests, or permit renewal applications.

# HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

<sup>1</sup> FACILITY: <sup>2</sup> Site ID #:	<sup>3</sup> <input type="checkbox"/> <90-DAY ACCUMULATION AREA <input type="checkbox"/> TREATMENT, STORAGE, OR DISPOSAL UNIT	<sup>4</sup> START DATE:	<sup>5</sup> END DATE:
---	--	--------------------------	------------------------

<sup>6</sup> ☐ Containers      ☐ Landfill      ☐ Thermal Treatment  
☐ Physical Treatment      ☐ Biological Treatment      ☐ Chemical Treatment  
☐ Tank      ☐ UST      ☐ Miscellaneous Unit (OB/OD, Cementation)

**PART I-** Enter condition of the item inspected (**OK**, **NA** [Not Applicable], or **AR** [Action Required]) in column for day inspected.

ITEM	INSPECTED FOR:	MON	TUE	WED	THU	FRI	SAT	SUN
<sup>7</sup> NO USE	No waste opened, moved, received, treated, or removed; or no waste stored							
<sup>8</sup> COMMUNICATIONS EQUIPMENT	Availability and proper operating condition							
<sup>9</sup> WARNING SIGNS	Posted, legible, and bilingual							
<sup>10</sup> SECURITY	Condition of fences, gates, locks, and other access control equipment							
<sup>11</sup> WORK SURFACES/ FLOORS	Any conditions that could lead to an accident or spill							
<sup>12</sup> SPILL/FIRE EQUIPMENT	Present, appropriate, and in proper operating condition							
<sup>13</sup> EYEWASHES/ SAFETY SHOWERS	Proper operating condition							
<sup>14</sup> WIND SOCK	Proper operating condition and checked for damage							
<sup>15</sup> SECONDARY CONTAINMENT	Standing water/waste, integrity, surrounding vegetation, and erosion							
<sup>16</sup> RUN-ON/OFF CONTROL	Ponding, integrity, erosion, and damage							
<sup>17</sup> COVERS/LIDS OF CONTAINERS	Closed and secured properly							
<sup>18</sup> LABELS	Proper labels on all tanks and containers							
<sup>19</sup> ACCUMULATION START DATE	Present, legible, and not exceeding limit							
<sup>20</sup> COMPATIBILITY	Separated according to compatibility							
<sup>21</sup> INTEGRITY (Containers, tanks, and ancillary equipment)	Integrity, leakage, deterioration, corrosion, and damage							
<sup>22</sup> (UN)LOADING AREA	Spills and deterioration							
<sup>23</sup> AISLE SPACE/STACKING	Appropriateness and adequacy							
<sup>24</sup> PALLETS AND RAISED CONTAINERS	Any condition that could result in failure							
<sup>25</sup> TANK SYSTEMS (Aboveground portions)	Discharge controls, leakage, fill level, and corrosion							
<sup>26</sup> TREATMENT TANKS	Proper operating condition and leakage							
<sup>27</sup> SHAFTS	Presence and condition of cover							
<sup>28</sup> FILTER VESSELS (for open burning)	Deterioration and sand condition							
<sup>29</sup> OPEN BURNING UNITS	Deterioration, vegetation, sand condition, erosion, leakage, and cover							
<sup>30</sup> OPEN DETONATION UNITS	Condition, vegetation, and erosion							
<sup>31</sup> CEMENTATION UNITS	Structural integrity and condition of equipment and systems							

**Figure C-1**

# HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

	MON	TUE	WED	THU	FRI	SAT	SUN
<sup>32</sup> DATE							
<sup>33</sup> TIME							
<sup>34</sup> <u>SIGNATURE OF INSPECTOR(S)</u>							

FACILITY:	Site ID #:	START DATE:	END DATE:
-----------	------------	-------------	-----------

**Part II-** For any AR (Action Required) in PART I, describe below: action required, action taken, date, and time of action. Attach additional sheets if necessary. If more than one action is required, number each AR.

35

Figure C-1 (Continued)

## Instruction for Use of the Hazardous and Mixed Waste Facility Inspection Record Form

### Part I

#### TO BE CONDUCTED FOR ALL INSPECTIONS:

(Not all items in this section will apply to all facilities. An "NA" [not applicable] is required if the item does not apply.)

1. **FACILITY:** Location information, including TA, building, and room (if applicable). Other location descriptors may be necessary (e.g., TA-59-3-114 or TA-59-1-S, Dock).
2. **Site ID Number:** An identification number is assigned to every facility. This allows for ease in identification of a certain TSD unit <90-day accumulation area.
3. **<90-DAY ACCUMULATION AREA:** Should be checked if this location is intended for operation in accordance with generator requirements for storage of hazardous or mixed waste for less than 90 days.

**TREATMENT, STORAGE, OR DISPOSAL (TSD) UNIT:** Should be checked if this location is listed in LANL's Hazardous Waste Facility Permit or General Part A Permit Application as a TSD operation.

4. **START DATE:** The date of the actual first working day of the week.
5. **END DATE:** The date of the actual last working day of the week.
6. Check the appropriate box for the type of operation. Several boxes may be checked, if necessary, for those locations where inspections are combined on a single sheet. You must have prior approval from RRES-SWRC to combine inspections for more than one unit.
7. **NO USE:** May be checked if waste was not received at, moved, or opened (to add or remove waste) within, treated at, or removed from a unit for the day in question. For some inspections that are performed weekly, "NO USE" may be checked if no waste was stored. In the situation that this box is checked, the individual responsible for the inspection must only complete this box and the signature section for that day/week. If any hazardous or mixed waste is subsequently placed at the site for any reason, a full inspection must be performed immediately and then subsequently according to the inspection plan. List "NA" to show normal nonworking days. Holidays and Laboratory closures should also be noted (e.g., by writing "H" or "Closed" in the first box and drawing a line all the way down the page).
8. Communication equipment must be inspected in order to ensure availability and proper operating condition for each piece of equipment (e.g., telephones, radios, and alarms). Consultation with RRES-SWRC prior to use of the facility/location is available, if necessary.

**Instruction for Use of the Hazardous and  
Mixed Waste Facility Inspection Record Form  
(Continued)**

9. Required signs must be legible and prominently posted. TSD units must be equipped with bilingual (English/Spanish) signs with the legend "DANGER UNAUTHORIZED PERSONNEL KEEP OUT." <90-day accumulation areas must be identified with a sign with the legend "<90-DAY HAZARDOUS WASTE STORAGE AREA." TSD units are required to have signs that read "HAZARDOUS WASTE STORAGE AREA" spaced 50 feet apart and legible from 25 feet away.
10. The TSD unit or <90-day accumulation area site security must be verified. Items such as fences, gates, locks, and other access control equipment should be checked for proper operating condition.
11. Process floors and other work surfaces at TSD units must be inspected for any conditions that could lead to a spill or an accident.
12. Hazardous or mixed waste TSD units and <90-day accumulation areas must have fire control and spill control equipment. TSD units will be in compliance with the Laboratory's Hazardous Waste Facility Permit Contingency Plan. Equipment must be present, in proper operating condition, and appropriate for the material in question. Outdoor fire-water supply systems must be checked for freezing and damage.
13. If present, eyewashes and safety showers must be inspected to ensure proper operating condition. Outdoor locations must be checked for freezing.
14. Wind socks, where present at TSD units, must be inspected to ensure that they are in proper operating condition and checked for damage.
15. Secondary containment structures for hazardous or mixed waste operations must be inspected to verify proper operating condition and to ensure adequate capacity. Structures must also be inspected for the presence of standing water or hazardous/mixed waste. For certain operations, secondary containment includes inspection of gloves, gloveboxes, hoods, and ventilation systems. For locations where inflatable "Porta Berms" are used, inspectors must ensure that they are adequately inflated. All monitoring and leak detection systems must also be checked.
16. Run-on and runoff controls, wherever present, must be checked. The integrity should be inspected by looking for signs of damage, erosion, ponding, or any other conditions that could lead to a spill or an accident.
17. All tanks and containers used for treating or storing hazardous or mixed waste must have the cover or lid securely in place. Containers are not considered to be closed until the lid/cover is fastened in the manner the manufacturer originally intended. However, the lid may be off of a tank or container during treatment (if it is part of the treatment), and while waste is being placed into or removed from a container.
18. All containers and tanks containing hazardous or mixed waste must be labeled with the words "HAZARDOUS WASTE."

**Instruction for Use of the Hazardous and  
Mixed Waste Facility Inspection Record Form  
(Continued)**

19. All containers and tanks of hazardous or mixed waste in <90-day accumulation areas must be marked with the accumulation start date. This date must be legible. At <90-day accumulation areas, containers must be marked with the accumulation start date at the time the container first receives any waste. For <90-day accumulation areas, no containers may exceed 90 days from the accumulation start date to the time they are delivered to a permitted treatment, storage, or disposal unit. At TSD units, all containers must be dated when they arrive at the facility. At TSD units, no hazardous or mixed waste may be stored for over one year, unless specifically exempted.
20. All hazardous or mixed waste containers holding materials that may be incompatible with any other materials at that location must be separated from those materials by dikes, berms, or other physical barriers to prevent a possible reaction.
21. All containers and tanks must be checked for structural integrity, leakage, corrosion, or damage. This includes checking the condition of all construction materials, fixtures, seams, and auxiliary equipment. There are special inspection criteria for tank systems (see Item 25 below).
22. Loading and unloading areas must be inspected daily when in use for signs of damage or deterioration that may lead to an accident or spill. This includes asphalt covered areas and areas where containers or tanks are handled or the contents thereof are transferred.
23. Adequate aisle space must be maintained to allow for inspection and for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency. All containers of hazardous and mixed waste must be stored in a manner that ensures a minimum 2-foot aisle space, unless otherwise specified for the facility.
24. Hazardous or mixed waste containers at TSD units and <90-day accumulation areas must be stored on pallets, elevated, or otherwise protected from contact with accumulated liquid.

**TANKS SYSTEMS:**

25. For tank systems used for treatment or storage of hazardous or mixed waste, all aboveground portions of the tank system, including any and all ancillary plumbing, must be inspected for signs of leaking, corrosion, deterioration, or improper operation. Tanks must be operated with a minimum freeboard of 6 inches. If the tank system includes discharge controls, overtopping controls, tank level alarms, or other monitoring equipment, including leak detection equipment, all controls and relevant data must be checked to ensure they are operating properly and that operation is within design specifications for the system.
26. Hazardous and mixed waste treatment tanks must be operated within the design specifications and in accordance with standard operating procedures and work plans. Tanks must be inspected for leakage or damage prior to operation.

**Instruction for Use of the Hazardous and  
Mixed Waste Facility Inspection Record Form  
(Continued)**

**SHAFTS:**

27. Shafts used for retrievable storage should have their covers securely in place and the surrounding area should show no evidence of erosion.

**FILTER VESSELS:**

28. The condition and adequacy of sand must be inspected in filter vessels. The vessels must also be inspected for deterioration and damage.

**OPEN BURNING UNITS:**

29. Open burning units must be inspected for deterioration, leakage, vegetation that could catch fire, the condition of sand (as appropriate), and assure that the unit is covered when not in use. Inspectors must also look for explosives and debris not consumed during the burn.

**OPEN DETONATION UNITS:**

30. Open detonation units must be inspected for deterioration, leakage, or vegetation that could catch fire. Inspectors must also look for explosives and debris not consumed by the detonation.

**CEMENTATION UNITS:**

31. The structural integrity and condition of equipment and systems must be inspected on cementation units. Units must also be inspected for signs of leaking, corrosion, deterioration, or improper operation.

**FOR ALL INSPECTIONS:**

32. Record of the date of the current inspection. Only one date is given for each inspection, whether a team or an individual performs the inspection.
33. Record of the time of the current inspection. Only one time is given for each inspection, whether a team or an individual performs the inspection.
34. Signature of each inspector involved in the current inspection.

**Instruction for Use of the Hazardous and  
Mixed Waste Facility Inspection Record Form  
(Continued)**

**Part II**

List any action required. Document any action taken immediately and express any plans for future action to be taken. If necessary, attach additional sheets to IRF to efficiently cover the action taken or required. Initial any information or comments added, and if more than one action is required or conducted, assign a number to each AR.

*For Informational Purposes Only*